

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

NICHOLAS MERRILL,

Plaintiff,

v.

LORETTA LYNCH, in her official capacity
as Attorney General of the United States, and
JAMES B. COMEY, in his official capacity
as Director of the Federal Bureau of
Investigation,

Defendants.

14 CIV. 9763 (VM)

PLAINTIFF'S MOTION FOR ATTORNEYS' FEES AND COSTS

Pursuant to the Equal Access to Justice Act, 28 U.S.C. § 2412, and Rule 54, Plaintiff Nicholas Merrill respectfully moves the Court for an award of attorneys' fees in the amount of \$82,689, and costs in the amount of \$350. Plaintiff's motion is supported by the accompanying Memorandum of Law, the Second Declaration of Nicholas Merrill, the Second Declaration of Jonathan Manes and accompanying exhibits, and all of the prior proceedings in this case.

Respectfully submitted,

/s/Jonathan Manes

Jonathan Manes, supervising attorney
David A. Schulz, supervising attorney
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Attorneys for Plaintiff Nicholas Merrill